

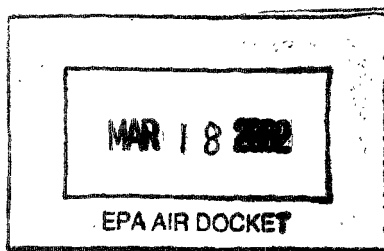


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 28 2002

OFFICE OF  
AIR AND RADIATION

Dr. Inés Triay, Manager  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221



Dear Dr. Triay:

We have begun our review of the Department of Energy (DOE), Carlsbad Field Office's (CBFO) annual report on changes in activities or conditions that pertain to the Waste Isolation Pilot Plant (WIPP), in accordance with 40 CFR 194.4(b)(4), and have determined that we need additional information to complete our review of the reported changes listed in your letter dated November 16, 2001.

We reviewed the three tables included in the change report: (1) Changes in WIPP Conditions or Activities Reportable under 40 CFR 194.4(b)(4); (2) Sandia National Laboratory (SNL) Revision Table; and (3) WIPP Waste Information System (WWIS) Revision Table. The additional information that we are requesting is divided into three main areas: 1) new or revised plans and reports; 2) inspections; and 3) WWIS.

1) New or Revised Plans and Reports: Please provide 5 copies each of the following reports:

- "Borehole Plugging and Abandonment Program Plan;"
- "SNL Compliance Monitoring Program: Recompletion of Wells to Monitor the Magenta Member of the Rustler Formation on the WIPP Site, Test Plan;"
- "Geotechnical Analysis Report for July 1999 - June 2000;"
- "WIPP Subsidence Monument Leveling Survey 2000;"

- “Delaware Basin Monitoring Annual Report;”
  - “Waste Isolation Pilot Plan Annual Site Environmental Report - Calendar Year 2000;” and
  - “Sandia National Laboratories Annual Compliance Monitoring Parameter Assessment,” October 2001.
- 2) Inspections: Table 1 states that CBFO certified the Los Alamos National Laboratory quality assurance and waste characterization programs for debris waste. We do not have any information on this certification. Please provide supporting documentation.
- 3) Table 1 includes a list of the total activity in curies of 10 radioisotopes accumulated in the WIPP as of September 2001 and Table 3 describes revisions to WWIS procedures, but does not include other necessary information. Please provide the following information and supporting WWIS reports for the current report and future change reports. The information should be provided both for the reporting year and for the cumulative life of the project to date (i.e., September 2000 to September 2001, and cumulatively since March 1999).
- Total volume of emplaced transuranic waste, in cubic feet;
  - Total curies of emplaced remote-handled transuranic waste (this value should be zero now since remote-handled waste is not currently allowed to be disposed of at WIPP); and
  - Inventory constraints on key waste parameters (radioisotopes, cellulose/plastics/rubbers, ferrous and non-ferrous metals, and free liquids) that were established by the certification, plus the amount (volume or activity per isotope, as appropriate) of each parameter emplaced, plus the percentage of the constraint that has been reached.

In addition, we did not find listed in the change report EPA’s two approvals of the Idaho National Environmental Engineering Laboratory to ship inorganic solidified wastes to the WIPP and to use Waste Assay Gamma Spectrometer (WAGS) system to characterize approved contact-handled, retrievable stored waste of Rocky Flats origin (Docket II-A4-15 and 17). You should include these actions in the change report.

Once we receive this additional information, we will complete our review of the changes and provide you a determination of whether the reported changes require a modification, suspension, or revocation. Our preliminary review indicates that the changes are not significant and will not require any of the above stated actions.

If you have any questions regarding the requested information and support documentation, please contact Caroline Laikin at (202) 564-9095.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Marcinowski", written in a cursive style.

Frank Marcinowski, Director  
Radiation Protection Division

cc: Matthew Silva, EEG